

ANNEX F

Additional Requirements for Establishments Eligible to Export Beef Products to Japan**1. Requirements applicable to the establishment****(a) Slaughter and processing**

Operators of slaughter establishments and integrated processing establishments are required to develop and implement written procedures to ensure the following:

- (1) that only products derived from cattle 20 months of age or less are prepared for export to Japan;
- (2) that all ineligible tissues are removed from these cattle in a hygienic manner to prevent cross contamination and commingling with meat products that may be exported to Japan; and
- (3) that the carcasses and meat products derived from these cattle are easily distinguished from other carcasses and beef products from the point at which the age is determined until the products are packaged and appropriately labelled or the carcass is removed from the establishment.

The written procedures should clearly outline the controls that will be implemented to ensure that applicable requirements are met and that eligible products can be readily distinguished from ineligible products at all times. The procedures must be acceptable to the inspector in charge and must include monitoring, verification and record-keeping activities, deviation procedures and be auditable and effective.

The procedures must address the following, as appropriate to the establishment and to CFIA verification needs:

- determination of the age of cattle by a method acceptable to the CFIA (See Section 2, below);
- from the point where age is determined, distinguishing cattle determined to be 20 months of age or less and/or the carcasses, offal and other parts of carcasses derived from such cattle;
- application of a mark or device to clearly identify the carcass sides of animals 20 months of age or less;
- hygienic removal of the head, excluding tongue and cheek meat, the palatine and lingual tonsils, the spinal cord and dura mater, the distal ileum, and the vertebral column, including the dorsal root ganglia. All ineligible tissues with the exception of the vertebral column and the dorsal root ganglia must be removed on the slaughter floor;
- cutting/deboning of eligible carcasses in distinct lots, segregated temporarily or by space from other carcasses and parts thereof. The cutting/boning activities should take place at the beginning of the shift and be completed before starting other production. Otherwise, all products derived from non-eligible carcasses must be removed from the production line prior to beginning production for Japan;
- labelling of boxes containing eligible meat or offal in a manner that will easily distinguish them from boxes containing meat or offal derived from other cattle;
- receiving procedures for eligible products in the case of establishments receiving products for cutting/boning, packaging or storage; and
- record keeping activities that will allow the CFIA to document their verifications over the production and the transfer of eligible products.

(b) Age determination

To verify the eligibility of beef products for export to Japan, the ages of animals must be determined by birth dates derived from the database of either the Canadian Cattle Identification Agency (CCIA) or Agri-Traçabilité Québec (ATQ) showing that the animals are 20 months of age or less at the time of slaughter.

(1) Before delivery to the establishment

When animals are ready or nearing readiness for slaughter their ear tags are scanned to capture their unique CCIA or ATQ identification numbers. This may take place at a beef producer's premises or at an auction market where animals are assembled for sale. Producers or auction market operators query the CCIA or ATQ database to obtain the birth dates associated with the identification numbers of the animals in question. Animals determined to be 20 months of age or less according to the birth dates are then presented for slaughter as a group of animals eligible to provide meat and meat products for export to Japan. These animals are accompanied to the abattoir by a report generated from the CCIA or ATQ system which documents the identification numbers and associated birth dates of the animals.

At the abattoir, the establishment operator confirms the ages of animals presented for slaughter and maintains the animals that are confirmed to be 20 months of age or less in identifiable groups, segregated from animals that are older than 20 months or whose ages have not been determined.

(2) At the establishment before ante mortem inspection

In situations where the ages of animals arriving for slaughter have not been pre-determined, an authorized establishment operator may query the CCIA or ATQ database to obtain the birth dates of the animals to determine their ages. As above, animals determined to be 20 months of age or less would be segregated from animals that are older than 20 months or whose ages have not been determined.

(3) At the establishment after slaughter

In situations where the ages of animals have not been pre-determined, an establishment operator may query the CCIA or ATQ database after slaughter to obtain the birth dates of the animals to determine their ages. Carcasses derived from animals determined to be 20 months of age or less would be segregated from carcasses derived from animals that are older than 20 months or those derived from animals whose ages have not been determined. All organs or tissues derived from carcasses of animals determined to be 20 months of age or less will need to be identified as such in order to be considered eligible for export to Japan.

Any product with the potential to be exported to Japan must be processed in compliance with Japan's requirements. For example, when slaughtering a group of animals in which some or all of them may be eligible for export of beef products to Japan upon confirmation of their ages being 20 months or less, all of the animals must be processed in accordance with Japan's requirements, e.g. by removing all tissues that are ineligible for export to Japan, including the spinal cord and dura mater, palatine and lingual tonsils, etc.

c) Requirements applicable to the transfer of eligible products between establishments

Annex J (of Introduction of Chapter 11 of the MOP) must be used when eligible products are moved between establishments. Japanese eligible products must be segregated from other products.

(d) Requirements applicable to storage activities

Eligible products must be segregated from other products by pallet to permit their easy identification when export certification is requested. Each lot must be covered by the "Verification sheet" (see Annex I). No export verification will be performed unless the "Verification Sheet" is available to document compliance of the specific product with Japanese requirements.

2. CFA Verification

Note: Where compliance cannot be verified, certification of product for export to Japan will not be provided. Where an operator is unable to meet applicable requirements or correct deviations, the establishment will be removed from the eligibility list for export to Japan.

2.1 Supervision over the production of eligible products:

CFIA inspection staff verify the accuracy and/or effectiveness of operator implementation of the following requirements during each shift that Japanese eligible products are manufactured. Verification activities must be documented using the Verification Sheet in Annex I of this section and must include:

- determination of age (based on CCIA or ATQ data) and identification of eligible carcasses, offal and other parts;
- removal of ineligible tissues and related hygienic procedures, including verification of complete removal of spinal cord and dura mater from all carcasses;
- distinguishing carcasses, offal and other parts;
- labelling; and
- sanitation program (according to routine inspection tasks).

In order to conduct the required verification, a CFIA inspector will need to be on-site for the duration of the operations where Japan eligible beef products are being manufactured. For all aspects of operations during which eligible products are handled (slaughtering, cutting/boning and packaging), the inspector must verify that the operator is following the agreed procedures when the establishment was designated for export to Japan. The "Verification Sheet" is first filled out to document slaughtering operations and it must follow the lot of eligible product to cutting/boning operations and / or packaging operations. It will accompany Annex J of Introduction of Chapter 11 when products are moved to another establishment for cutting/boning, packaging or storage waiting for export. No export verification will be conducted in absence of either the transfer certificate (Annex J of Introduction), or the Verification Sheet (Annex I of this section) as those documents will serve to establish the eligibility of the product.

2.2 Supervisory visits to eligible establishments:

A monthly review of the establishment's performance is conducted by the veterinarian or Inspector in Charge of each establishment. The report generated from this review is submitted to a Regional Veterinary Officer (in the case of a slaughter establishment) who will follow up on any concerns raised by the report. A quarterly review of the establishment's performance and CFIA verification responsibilities is conducted by a Regional Veterinary Officer.

The CFIA supervisor must complete a monthly unannounced visit to slaughter and stand-alone cutting/boning establishments eligible to ship beef to Japan. The visit must take place during the time that processing for Japan is occurring. Since the supervisor will have to know when processing is taking place, it is recognized that it may not be totally unannounced. The report and form to be used to document the visit is the "Export Audit Checklist - Japan Beef" (Annex H). Once completed the report is to be sent to the Regional Director and to the Area Office, Export Specialist. It is understood that the supervisory visit will be performed only during the months where Japanese products are being produced.